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July 10, 2023

VIA ECF

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2013
New York, NY 10007

Re: Ortega v. Trident Restoration Inc., et al.,
No.: 23-cv-1927 (KPF)

Dear Judge Failla,

We represent Named Plaintiffs Angel Ortega and Jorge Navarro, as well as ten Opt-In Plaintiffs in the above-referenced matter.

By letter-motion dated June 27, 2023, Plaintiffs requested that the Court grant an adjournment of the court-annexed mediation in this matter until after the resolution of class certification motion practice. *See* ECF Dkt No. 50. By order dated July 5, 2023, this Court instructed Defendants to respond to Plaintiffs' letter-motion on or before July 7, 2023. *See* ECF Dkt No. 51. As of the date of this letter, Defendants have not responded as instructed by the Court.

Accordingly, Plaintiffs respectfully request that the Court grant the relief requested by Plaintiffs in their original letter-motion: (1) an adjournment of the court-annexed mediation until after Plaintiffs' class certification motion is resolved; and (2) an order permitting Plaintiffs to conduct precertification discovery of class-wide wage and hour and compensation documents. *See* ECF Dkt No. 50 at 1-2.

We thank the Court for its attention to this matter.

Regards,

/s/Lucas C. Buzzard
Lucas C. Buzzard